

February 17, 2023

**BY ECF**

Honorable Ona T. Wang, U.S.M.J.  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Sillam et al. v. Labaton Sucharow LLP et al.*, No. 21 Civ. 6675 (CM)(OTW)

Dear Magistrate Judge Wang:

Pursuant to Your Honor's Order [Doc. 79], the parties submit this joint status letter.

The depositions of both Plaintiffs, Gérard Sillam and Aldric Saulnier, will be taken under the Hague Convention. At this time Defendants anticipate taking the depositions remotely. The parties are making the necessary arrangements for these depositions, and anticipate submitting a proposed order appointing a Commissioner and a proposed letter of request under the Hague Convention for the Court's review next week.

The parties jointly request that the discovery end date, which is currently February 28, 2023, be extended to June 30, 2023 to allow time for the Hague Convention procedures to be completed and all depositions to be conducted, as well as other remaining discovery; and that the deadline for submission of the pre-trial order, which is currently March 31, 2023, be extended to July 31, 2023. These extensions should be sufficient to complete the Hague Convention procedures and other remaining discovery assuming the cooperation of all parties and of the authorities in France. We note that Judge McMahon's case management plan order [Doc. 41 as modified by Doc. 50] provides that an extension of discovery deadlines requires her approval, and the parties jointly request that Your Honor recommend such approval.

The parties have no other discovery issues to raise with the Court at this time.

Respectfully,

/S/  
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Counsel for Plaintiffs

/S/  
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